

THE ROSEN LAW FIRM, P.A.

Phillip Kim, Esq. (PK 9384)

Laurence M. Rosen, Esq. (LR 5733)

275 Madison Avenue, 34th Floor

New York, New York 10016

Telephone: (212) 686-1060

Fax: (212) 202-3827

Email: pkim@rosenlegal.com

Email: lrosen@rosenlegal.com

[Proposed] Lead Counsel for Plaintiff and Class

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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EDWARD S. GUTMAN, Individually and on Behalf of All
Others Similarly Situated,

No.: 1:15-cv-07192 (CM)

Plaintiff,

vs.

Robert F.X. Sillerman, D. Geoffrey
Armstrong, John Miller, Michael John Meyer,
and SFX Entertainment, Inc.,

**NOTICE OF MOTION OF
DAVID CHAN TO: (1)
APPOINT LEAD
PLAINTIFF; AND (2)
APPROVE LEAD
PLAINTIFF'S SELECTION
OF COUNSEL**

CLASS ACTION

Defendants.

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PLEASE TAKE NOTICE that pursuant to Section 21D of the Securities and Exchange
Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform
Act of 1995 (the “PSLRA”), Plaintiff David Chan (“Movant”) hereby moves this Court, the
Honorable Colleen McMahon, United States District Judge, for an order:

- (a) appointing Movant to serve as Lead Plaintiff in this action; and
- (b) approving Movant’s selection of The Rosen Law Firm, P.A. as Lead Counsel for
the litigation.

In support of this Motion, Movant submits: (1) Memorandum of Law dated November 10, 2015 (and exhibits); and (2) a [Proposed] Order granting Movant's Motion to appoint Lead Plaintiff, and approving Lead Plaintiff's selection of Counsel.

Respectfully submitted,

Dated: November 10, 2015

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

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Email: lrosen@rosenlegal.com

[Proposed] Lead Counsel for Plaintiff and Class

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of November, 2015, a true and correct copy of the foregoing **NOTICE OF MOTION OF DAVID CHAN TO: (1) APPOINT LEAD PLAINTIFF; AND (2) APPROVE LEAD PLAINTIFF'S SELECTION OF COUNSEL** was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip Kim